

May 4, 2023

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New York, NY 10002

Hon. Lewis Kaplan  
500 Pearl Street, Courtroom 21B  
New York, NY 10007

Honorable Judge Kaplan,

My name is Victoria Bekiempis; I am a journalist covering the proceedings in *Carroll v. Trump* for *New York* magazine. I am writing today to request that both plaintiff and defense exhibits in *Carroll v. Trump*, 1:22-cv-10016-LAK, be provided to media organizations once they are entered into evidence, including the video deposition of Donald Trump.

While the press corps recognizes that the dissemination of exhibits in civil proceedings is often up to the litigants, *Carroll v. Trump* is a unique situation meriting the court's intervention in the release of trial exhibits. Not only does the presumption of access enshrined by the U.S. Constitution, New York, and common law hold true—the case is of immense public interest given that the defendant in this case, Donald Trump, is currently a presidential candidate. This weighs heavily in favor of providing access to these exhibits. This is especially true in the case of Donald Trump's video deposition. We would request that the parties be directed to make available the exhibits at the end of the day in which they were introduced as public exhibits.

We respectfully request for your honor to direct the parties to provide digital copies of the evidence to media organizations or, in the alternative, request the opportunity to be heard on this issue.

Respectfully,



Victoria Bekiempis